

EXHIBIT A

John Lawlor

From: Chang, Shan M <changsh@SEC.GOV>
Sent: Tuesday, April 7, 2020 3:45 PM
To: Jon Jacobson
Cc: Nicoleau, Raynette R.
Subject: RE: Patrick Primavera
Attachments: Form 1662.pdf

Dear Jon,

Good speaking to you, and take care. As discussed, I have attached the SEC's Form 1662 -- please forward to your client at your convenience.

Shan Chang
Senior Counsel, Division of Enforcement
U.S. Securities and Exchange Commission
801 Brickell Avenue, Suite 1950
Miami, Florida 33131
Tel. (305) 982-6319
Email: changsh@sec.gov

From: Jon Jacobson <jjacobson@jlpa.com>
Sent: Tuesday, April 7, 2020 3:38 PM
To: Chang, Shan M <changsh@SEC.GOV>
Subject: Patrick Primavera

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Shan:

Following up on our telephone conversation a few moments ago, I have been retained to represent Patrick Primavera in connection with your request to interview him regarding TCP/Robert Press. As I soon as I have an opportunity to speak with Patrick, I will send you his availability for a telephonic interview. Should you need to reach me before then, my contact information is below. Thank you, and stay safe.



JACOBSON LAW
Jon A. Jacobson

JACOBSON LAW P.A. | 224 Datura Street, Suite 812 | West Palm Beach, FL 33401
Tel 561.880.8900 | Fax 561.880.8910
Toll Free Tel 800.801.JLPA (5572) | Toll Free Fax 844.801.JLPA (5572)
jjacobson@jlpa.com | www.jlpa.com



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SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

Supplemental Information for Persons Requested to Supply
Information Voluntarily or Directed to Supply Information
Pursuant to a Commission Subpoena

A. False Statements and Documents

Section 1001 of Title 18 of the United States Code provides that fines and terms of imprisonment may be imposed upon:

[W]hoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully--

- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
- (2) makes any materially false, fictitious, or fraudulent statement or representation; or
- (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.

Section 1519 of Title 18 of the United States Code provides that fines and terms of imprisonment may be imposed upon:

Whoever knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States . . . , or in relation to or contemplation of any such matter.

B. Testimony

If your testimony is taken, you should be aware of the following:

1. *Record.* Your testimony will be transcribed by a reporter. If you desire to go off the record, please indicate this to the Commission employee taking your testimony, who will determine whether to grant your request. The reporter will not go off the record at your, or your counsel's, direction.
2. *Counsel.* You have the right to be accompanied, represented and advised by counsel of your choice. Your counsel may advise you before, during and after your testimony; question you briefly at the conclusion of your testimony to clarify any of the answers you give during testimony; and make summary notes during your testimony solely for your use. If you are accompanied by counsel, you may consult privately.

If you are not accompanied by counsel, please advise the Commission employee taking your testimony if, during the testimony, you desire to be accompanied, represented and advised by counsel. Your testimony will be adjourned once to afford you the opportunity to arrange to be so accompanied, represented or advised.

You may be represented by counsel who also represents other persons involved in the Commission's investigation. This multiple representation, however, presents a potential conflict of interest if one client's interests are or may be adverse to another's. If you are represented by counsel who also represents other persons involved in the investigation, the Commission will assume that you and counsel have discussed and resolved all issues concerning possible conflicts of interest. The choice of counsel, and the responsibility for that choice, is yours.

3. *Transcript Availability.* Rule 6 of the Commission's Rules Relating to Investigations, 17 CFR 203.6, states:

A person who has submitted documentary evidence or testimony in a formal investigative proceeding shall be entitled, upon written request, to procure a copy of his documentary evidence or a transcript of his testimony on payment of the appropriate fees: *Provided, however,* That in a nonpublic formal investigative proceeding the Commission may for good cause deny such request. In any event, any witness, upon proper identification, shall have the right to inspect the official transcript of the witness' own testimony.

If you wish to purchase a copy of the transcript of your testimony, the reporter will provide you with a copy of the appropriate form. Persons requested to supply information voluntarily will be allowed the rights provided by this rule.

4. *Perjury.* Section 1621 of Title 18 of the United States Code provides that fines and terms of imprisonment may be imposed upon:

Whoever--

- (1) having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify

SEC 1662 (08-16)

PRIMAVERA MTD 000003

truly, or that any written testimony, declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true; or

(2) in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true.

5. *Fifth Amendment and Voluntary Testimony* Information you give may be used against you in any federal, state, local or foreign administrative, civil or criminal proceeding brought by the Commission or any other agency.

You may refuse, in accordance with the rights guaranteed to you by the Fifth Amendment to the Constitution of the United States, to give any information that may tend to incriminate you.

If your testimony is not pursuant to subpoena, your appearance to testify is voluntary, you need not answer any question, and you may leave whenever you wish. Your cooperation is, however, appreciated.

6. *Formal Order Availability*. If the Commission has issued a formal order of investigation, it will be shown to you during your testimony, at your request. If you desire a copy of the formal order, please make your request in writing.

C. Submissions and Settlements

Rule 5(c) of the Commission's Rules on Informal and Other Procedures, 17 CFR 202.5(c), states:

Persons who become involved in . . . investigations may, on their own initiative, submit a written statement to the Commission setting forth their interests and position in regard to the subject matter of the investigation. Upon request, the staff, in its discretion, may advise such persons of the general nature of the investigation, including the indicated violations as they pertain to them, and the amount of time that may be available for preparing and submitting a statement prior to the presentation of a staff recommendation to the Commission for the commencement of an administrative or injunction proceeding. Submissions by interested persons should be forwarded to the appropriate Division Director or Regional Director with a copy to the staff members conducting the investigation and should be clearly referenced to the specific investigation to which they relate. In the event a recommendation for the commencement of an enforcement proceeding is presented by the staff, any submissions by interested persons will be forwarded to the Commission in conjunction with the staff memorandum.

The staff of the Commission routinely seeks to introduce submissions made pursuant to Rule 5(c) as evidence in Commission enforcement proceedings, when the staff deems appropriate.

Rule 5(f) of the Commission's Rules on Informal and Other Procedures, 17 CFR 202.5(f), states:

In the course of the Commission's investigations, civil lawsuits, and administrative proceedings, the staff, with appropriate authorization, may discuss with persons involved the disposition of such matters by consent, by settlement, or in some other manner. It is the policy of the Commission, however, that the disposition of any such matter may not, expressly or impliedly, extend to any criminal charges that have been, or may be, brought against any such person or any recommendation with respect thereto. Accordingly, any person involved in an enforcement matter before the Commission who consents, or agrees to consent, to any judgment or order does so solely for the purpose of resolving the claims against him in that investigative, civil, or administrative matter and not for the purpose of resolving any criminal charges that have been, or might be, brought against him. This policy reflects the fact that neither the Commission nor its staff has the authority or responsibility for instituting, conducting, settling, or otherwise disposing of criminal proceedings. That authority and responsibility are vested in the Attorney General and representatives of the Department of Justice.

D. Freedom of Information Act

The Freedom of Information Act, 5 U.S.C. 552 (the "FOIA"), generally provides for disclosure of information to the public. Rule 83 of the Commission's Rules on Information and Requests, 17 CFR 200.83, provides a procedure by which a person can make a written request that information submitted to the Commission not be disclosed under the FOIA. That rule states that no determination as to the validity of such a request will be made until a request for disclosure of the information under the FOIA is received. Accordingly, no response to a request that information not be disclosed under the FOIA is necessary or will be given until a request for disclosure under the FOIA is received. If you desire an acknowledgment of receipt of your written request that information not be disclosed under the FOIA, please provide a duplicate request, together with a stamped, self-addressed envelope.

E. Authority for Solicitation of Information

Persons Directed to Supply Information Pursuant to Subpoena. The authority for requiring production of information is set forth in the subpoena. Disclosure of the information to the Commission is mandatory, subject to the valid assertion of any legal right or privilege you might have.

Persons Requested to Supply Information Voluntarily. One or more of the following provisions authorizes the Commission to solicit the information requested: Sections 19 and/or 20 of the Securities Act of 1933; Section 21 of the Securities Exchange Act of 1934; Section 321 of the Trust Indenture Act of 1939; Section 42 of the Investment Company Act of 1940; Section 209 of the Investment Advisers Act of 1940; and 17 CFR 202.5. Disclosure of the requested information to the Commission is voluntary on your part.

F. Effect of Not Supplying Information

Persons Directed to Supply Information Pursuant to Subpoena. If you fail to comply with the subpoena, the Commission may seek a court order requiring you to do so. If such an order is obtained and you thereafter fail to supply the information, you may be subject to civil and/or criminal sanctions for contempt of court. In addition, Section 21(c) of the Securities Exchange Act of 1934, Section 42(c) of the Investment Company Act of 1940, and Section 209(c) of the Investment Advisers Act of 1940 provide that fines and terms of imprisonment may be imposed upon any person who shall, without just cause, fail or refuse to attend and testify or to answer any lawful inquiry, or to produce books, papers, correspondence, memoranda, and other records in compliance with the subpoena.

Persons Requested to Supply Information Voluntarily. There are no direct sanctions and thus no direct effects for failing to provide all or any part of the requested information.

G. Principal Uses of Information

The Commission's principal purpose in soliciting the information is to gather facts in order to determine whether any person has violated, is violating, or is about to violate any provision of the federal securities laws or rules for which the Commission has enforcement authority, such as rules of securities exchanges and the rules of the Municipal Securities Rulemaking Board. Facts developed may, however, constitute violations of other laws or rules. Information provided may be used in Commission and other agency enforcement proceedings. Unless the Commission or its staff explicitly agrees to the contrary in writing, you should not assume that the Commission or its staff acquiesces in, accedes to, or concurs or agrees with, any position, condition, request, reservation of right, understanding, or any other statement that purports, or may be deemed, to be or to reflect a limitation upon the Commission's receipt, use, disposition, transfer, or retention, in accordance with applicable law, of information provided.

H. Routine Uses of Information

The Commission often makes its files available to other governmental agencies, particularly United States Attorneys and state prosecutors. There is a likelihood that information supplied by you will be made available to such agencies where appropriate. Whether or not the Commission makes its files available to other governmental agencies is, in general, a confidential matter between the Commission and such other governmental agencies.

Set forth below is a list of the routine uses which may be made of the information furnished.

1. To appropriate agencies, entities, and persons when (a) it is suspected or confirmed that the security or confidentiality of information in the system of records has been compromised; (b) the SEC has determined that, as a result of the suspected or confirmed compromise, there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of this system or other systems or programs (whether maintained by the SEC or another agency or entity) that rely upon the compromised information; and (c) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the SEC's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm.
2. To other federal, state, local, or foreign law enforcement agencies; securities self-regulatory organizations; and foreign financial regulatory authorities to assist in or coordinate regulatory or law enforcement activities with the SEC.
3. To national securities exchanges and national securities associations that are registered with the SEC, the Municipal Securities Rulemaking Board; the Securities Investor Protection Corporation; the Public Company Accounting Oversight Board; the federal banking authorities, including, but not limited to, the Board of Governors of the Federal Reserve System, the Comptroller of the Currency, and the Federal Deposit Insurance Corporation; state securities regulatory agencies or organizations; or regulatory authorities of a foreign government in connection with their regulatory or enforcement responsibilities.
4. By SEC personnel for purposes of investigating possible violations of, or to conduct investigations authorized by, the federal securities laws.
5. In any proceeding where the federal securities laws are in issue or in which the Commission, or past or present members of its staff, is a party or otherwise involved in an official capacity.

6. In connection with proceedings by the Commission pursuant to Rule 102(e) of its Rules of Practice, 17 CFR 201.102(e)
7. To a bar association, state accountancy board, or other federal, state, local, or foreign licensing or oversight authority; or professional association or self-regulatory authority to the extent that it performs similar functions (including the Public Company Accounting Oversight Board) for investigations or possible disciplinary action.
8. To a federal, state, local, tribal, foreign, or international agency, if necessary to obtain information relevant to the SEC's decision concerning the hiring or retention of an employee; the issuance of a security clearance; the letting of a contract; or the issuance of a license, grant, or other benefit.
9. To a federal, state, local, tribal, foreign, or international agency in response to its request for information concerning the hiring or retention of an employee; the issuance of a security clearance; the reporting of an investigation of an employee; the letting of a contract; or the issuance of a license, grant, or other benefit by the requesting agency, to the extent that the information is relevant and necessary to the requesting agency's decision on the matter.
10. To produce summary descriptive statistics and analytical studies, as a data source for management information in support of the function for which the records are collected and maintained or for related personnel management functions or manpower studies; may also be used to respond to general requests for statistical information (without personal identification of individuals) under the Freedom of Information Act.
11. To any trustee, receiver, master, special counsel, or other individual or entity that is appointed by a court of competent jurisdiction, or as a result of an agreement between the parties in connection with litigation or administrative proceedings involving allegations of violations of the federal securities laws (as defined in section 3(a)(47) of the Securities Exchange Act of 1934, 15 U.S.C. 78c(a)(47)) or pursuant to the Commission's Rules of Practice, 17 CFR 201.100 - 900 or the Commission's Rules of Fair Fund and Disgorgement Plans, 17 CFR 201.1100-1106, or otherwise, where such trustee, receiver, master, special counsel, or other individual or entity is specifically designated to perform particular functions with respect to, or as a result of, the pending action or proceeding or in connection with the administration and enforcement by the Commission of the federal securities laws or the Commission's Rules of Practice or the Rules of Fair Fund and Disgorgement Plans.
12. To any persons during the course of any inquiry, examination, or investigation conducted by the SEC's staff, or in connection with civil litigation, if the staff has reason to believe that the person to whom the record is disclosed may have further information about the matters related therein, and those matters appeared to be relevant at the time to the subject matter of the inquiry.
13. To interns, grantees, experts, contractors, and others who have been engaged by the Commission to assist in the performance of a service related to this system of records and who need access to the records for the purpose of assisting the Commission in the efficient administration of its programs, including by performing clerical, stenographic, or data analysis functions, or by reproduction of records by electronic or other means. Recipients of these records shall be required to comply with the requirements of the Privacy Act of 1974, as amended, 5 U.S.C. 552a.
14. In reports published by the Commission pursuant to authority granted in the federal securities laws (as such term is defined in section 3(a)(47) of the Securities Exchange Act of 1934, 15 U.S.C. 78c(a)(47)), which authority shall include, but not be limited to, section 21(a) of the Securities Exchange Act of 1934, 15 U.S.C. 78u(a)).
15. To members of advisory committees that are created by the Commission or by Congress to render advice and recommendations to the Commission or to Congress, to be used solely in connection with their official designated functions.
16. To any person who is or has agreed to be subject to the Commission's Rules of Conduct, 17 CFR 200.735-1 to 200.735-18, and who assists in the investigation by the Commission of possible violations of the federal securities laws (as such term is defined in section 3(a)(47) of the Securities Exchange Act of 1934, 15 U.S.C. 78c(a)(47)), in the preparation or conduct of enforcement actions brought by the Commission for such violations, or otherwise in connection with the Commission's enforcement or regulatory functions under the federal securities laws.
17. To a Congressional office from the record of an individual in response to an inquiry from the Congressional office made at the request of that individual.
18. To members of Congress, the press, and the public in response to inquiries relating to particular Registrants and their activities, and other matters under the Commission's jurisdiction.
19. To prepare and publish information relating to violations of the federal securities laws as provided in 15 U.S.C. 78c(a)(47)), as amended.
20. To respond to subpoenas in any litigation or other proceeding.
21. To a trustee in bankruptcy.

22. To any governmental agency, governmental or private collection agent, consumer reporting agency or commercial reporting agency, governmental or private employer of a debtor, or any other person, for collection, including collection by administrative offset, federal salary offset, tax refund offset, or administrative wage garnishment, of amounts owed as a result of Commission civil or administrative proceedings.

* * * * *

Small Business Owners: The SEC always welcomes comments on how it can better assist small businesses. If you would like more information, or have questions or comments about federal securities regulations as they affect small businesses, please contact the Office of Small Business Policy, in the SEC's Division of Corporation Finance, at 202-551-3460. If you would prefer to comment to someone outside of the SEC, you can contact the Small Business Regulatory Enforcement Ombudsman at <http://www.sba.gov/ombudsman> or toll free at 888-REG-FAIR. The Ombudsman's office receives comments from small businesses and annually evaluates federal agency enforcement activities for their responsiveness to the special needs of small business.

From: Jon Jacobson <jjacobson@jlpa.com>
Sent: Tuesday, April 7, 2020 3:38 PM
To: Chang, Shan M <chang.sh@SEC.GOV>
Subject: Patrick Primavera

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Shan:

Following up on our telephone conversation a few moments ago, I have been retained to represent Patrick Primavera in connection with your request to interview him regarding TCP/Robert Press. As I soon as I have an opportunity to speak with Patrick, I will send you his availability for a telephonic interview. Should you need to reach me before then, my contact information is below. Thank you, and stay safe.



JACOBSON LAW P.A.
Jon A. Jacobson

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John Lawlor

From: Chang, Shan M <changsh@SEC.GOV>
Sent: Friday, April 10, 2020 10:24 AM
To: Jon Jacobson
Cc: Nicoleau, Raynette R.
Subject: RE: Patrick Primavera

Great. Let's speak next Wednesday, 4/15, at 10am. In addition to Raynette and myself, on the call from the SEC will be:

- (1) Andrew Schiff, Regional Trial Counsel
- (2) Stephanie Moot, Senior Trial Counsel
- (3) Chedly Dumornay, Assistant Regional Director
- (4) Ray Andjich, SEC contractor – he is assisting in a paralegal type role

Please use the following for dial-in, and please pass on to your client as well:

202-551-7000 (US/Canada)
888-732-8001 (US/Canada Toll-free)

Access Code:
988 005 101

Shan Chang
Senior Counsel, Division of Enforcement
U.S. Securities and Exchange Commission
801 Brickell Avenue, Suite 1950
Miami, Florida 33131
Tel. (305) 982-6319
Email: changsh@sec.gov

From: Jon Jacobson <jjacobson@jlpa.com>
Sent: Thursday, April 9, 2020 12:50 PM
To: Chang, Shan M <changsh@SEC.GOV>
Cc: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>
Subject: RE: Patrick Primavera

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Good news. Mr. Primavera and I are available for a telephonic interview on the following/dates (in order of preference):

April 14 – Any time from 10am to 5pm
April 13 – Any time from 10am to 5pm

April 15 – Any time from 10am to 5pm

April 16 – Any time from 10am to 5pm

Please let me know if any of these dates/times work for you guys. Thanks.



JACOBSON LAW P.A.

Jon A. Jacobson

JACOBSON LAW P.A. | 224 Datura Street, Suite 812 | West Palm Beach, FL 33401

Tel 561.880.8900 | Fax 561.880.8910

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From: Chang, Shan M <changsh@SEC.GOV>

Sent: Tuesday, April 7, 2020 3:45 PM

To: Jon Jacobson <jjacobson@jlpa.com>

Cc: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>

Subject: RE: Patrick Primavera

Dear Jon,

Good speaking to you, and take care. As discussed, I have attached the SEC's Form 1662 -- please forward to your client at your convenience.

Shan Chang

Senior Counsel, Division of Enforcement

U.S. Securities and Exchange Commission

801 Brickell Avenue, Suite 1950

Miami, Florida 33131

Tel. (305) 982-6319

Email: changsh@sec.gov

John Lawlor

From: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>
Sent: Tuesday, September 22, 2020 10:22 AM
To: Jon Jacobson
Cc: Chang, Shan M
Subject: TCA / Primavera

Hi Jon,

We would like to schedule a follow-up interview with Mr. Primavera to fill in some of the questions we have from his previous interview. Are you and Mr. Primavera available next week? The call would not be lengthy, but please reserve 60-90 minutes. Our schedule is open for any day next week for a call beginning at 2:30 pm.

Thank you,

Raynette R. Nicoleau
Senior Counsel
U.S. Securities and Exchange Commission
Miami Regional Office
801 Brickell Avenue, Suite 1950
Miami, Florida 33131
Tel. (305) 982-6308
Fax (305) 536-4146

John Lawlor

From: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>
Sent: Wednesday, October 7, 2020 11:54 AM
To: Jon Jacobson
Cc: Chang, Shan M
Subject: RE: TCA / Primavera

Hi Jon,

I might show a document to Mr. Primavera today, so please use a computer or device where a shared document can be viewed on the screen.

Thank you,
Raynette

From: Jon Jacobson <jjacobson@jlpa.com>
Sent: Friday, September 25, 2020 11:03 AM
To: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>
Cc: Chang, Shan M <changsh@SEC.GOV>
Subject: RE: TCA / Primavera

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Good news. I was able to immediately reach my client this time. October 7 at 3:00 pm works for both of us. Thanks.



JACOBSON LAW P.A.

Jon A. Jacobson

JACOBSON LAW P.A. | 224 Datura Street, Suite 812 | West Palm Beach, FL 33401

Tel 561.880.8900 | Fax 561.880.8910

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From: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>
Sent: Friday, September 25, 2020 10:51 AM
To: Jon Jacobson <jjacobson@jlpa.com>
Cc: Chang, Shan M <changsh@SEC.GOV>
Subject: RE: TCA / Primavera

Good morning Jon,

October 6th is one of the dates I mentioned as a possibility on our phone call, but unfortunately we have a conflict. Would any of the following dates work for you at 3:00 pm? The dates in bold font are our preferences, but any of them would work.

Tuesday, Sept. 29th
Wednesday, Sept 30th
Thursday, Oct. 1st
Friday, Oct. 2nd
Monday, Oct 5th
Wednesday, Oct. 7th

Thank you,
Raynette

From: Jon Jacobson <jjacobson@jlpa.com>
Sent: Thursday, September 24, 2020 5:10 PM
To: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>
Cc: Chang, Shan M <changsh@SEC.GOV>
Subject: RE: TCA / Primavera

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Raynette:

I have confirmed that Patrick and I can both be available for a telephonic interview on October 6. Patrick's preference would be to start the call at 3:00 pm EST.



JACOBSON LAW P.A.

Jon A. Jacobson

JACOBSON LAW P.A. | 224 Datura Street, Suite 812 | West Palm Beach, FL 33401

Tel 561.880.8900 | Fax 561.880.8910

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From: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>

Sent: Tuesday, September 22, 2020 10:22 AM

To: Jon Jacobson <jjacobson@jlpa.com>

Cc: Chang, Shan M <changsh@SEC.GOV>

Subject: TCA / Primavera

Hi Jon,

We would like to schedule a follow-up interview with Mr. Primavera to fill in some of the questions we have from his previous interview. Are you and Mr. Primavera available next week? The call would not be lengthy, but please reserve 60-90 minutes. Our schedule is open for any day next week for a call beginning at 2:30 pm.

Thank you,

Raynette R. Nicoleau

Senior Counsel

U.S. Securities and Exchange Commission

Miami Regional Office

801 Brickell Avenue, Suite 1950

Miami, Florida 33131

Tel. (305) 982-6308

Fax (305) 536-4146

John Lawlor

From: Jon Jacobson <jjacobson@jlpa.com>
Sent: Monday, December 21, 2020 4:28 PM
To: Nicoleau, Raynette R.
Subject: RE: TCA (FL-4054)
Attachments: [2020-12-08] Declaration of Patrick Primavera - PP edits - Redlined.docx

Raynette:

Attached is an ever-so-slightly revised draft of Mr. Primavera's proposed Declaration. I am sending you a red-lined version so that you can more easily see his edits. The good news is that he only had about four edits, and they were mostly word-smithing to be more precise/accurate. If you have any questions or wish to discuss these proposed edits, please call me. Otherwise, if these edits are acceptable, please send a revised draft of the Declaration incorporating these edits, and I will have Mr. Primavera sign and return it to you as soon as possible. Thanks.



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From: Nicoleau, Raynette R. <NicoleauR@SEC.GOV>

Sent: Monday, December 21, 2020 11:08 AM

To: Jon Jacobson <jjacobson@jlpa.com>

Subject: TCA (FL-4054)

Hi Jon,

Can you give me an update on Mr. Primavera's declaration, please?

Thank you,

Raynette R. Nicoleau
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